

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:
ROBERT BELCHER,

Debtor,

Chapter 13
Case No. 22-10560-JEB

DEBTOR'S RESPONSE TO CHAPTER 13 TRUSTEE'S OBJECTION TO PLAN

Now comes the Debtor, by counsel, and hereby Responds to the Chapter 13 Trustee's Objection to Plan (Docket #48).

In support of this Response, Debtor states:

1. The Debtor admits the allegations as set forth in paragraph 1 and 2 of the Objection to Plan.
2. Further responding to the Objection, Debtor merely requests that the Court grant him an extension until after September 28, 2022 to file his amended plan which is the bar date for filing unsecured claims in this case.

WHEREFORE, Debtor Responds to the Trustee's Objection and requests the relief asked for herein.

Respectfully Submitted
Debtor's Counsel

/s/ John F. Sommerstein
John F. Sommerstein
1091 Washington Street
Gloucester, MA 01930
(617) 523-7474

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:
ROBERT BELCHER,

Debtor,

Chapter 13
Case No. 22-10560-JEB

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached Response was served upon the parties listed below via the Court's ECF system on September 1, 2022.

/s/ John F. Sommerstein
John F. Sommerstein

John Fitzgerald
USTPRegion01.BO.ECF@USDQJ.GOV

Jason Giguere on behalf of Creditor The Bank of New York Mellon formerly known as The Bank of New York as successor Trustee to JPMorgan Chase Bank, N.A., as Trustee for the Certificateholders of Structured Asset Mortgage Investments II
bankruptcyNE@orlans.com, ANHSOrlans@InfoEX.com

Craig B. Rule on behalf of Creditor The New Yoork Mellon, fka, The Bank of New YUork, as successor in interest to JPMorgage Chase Bank, N.A., as Trustee for Structured Asset Mortgage Investments II Trust 2006-AR-4
bankruptcyNE@orlans.com, ANHSOM@4stechnologies.com

John F. Sommerstein on behalf of Debtor Robert Belcher
jfsommer@aol.com, r43822@notify.bestcase.com